

² Interview with Craig Fugate, FEMA Administrator, www.freeradioonmyphone.org.

professionals with excellent relationships with local emergency officials, local radio remains the pre-eminent source of information in a disaster.

- During emergencies, cellular communications networks often cease to function or are overloaded. In each of Hurricanes Irene (2011) and Sandy (2012), the East Coast Earthquake (2011), and the Boston Marathon Bombings (2013), as well as in countless other emergency situations, cellular networks were overloaded leaving people unable to gather life-saving information. This situation is unlikely to change because it is not cost effective to design a cellular network to withstand the peak traffic that occurs during an emergency.⁵ As part of the Commission's overall efforts to efficiently allocate our Nation's spectrum, the Commission should also be actively encouraging the use of the most efficient spectrum in emergency situations. In the event of a local emergency, radio's one-to-many distribution system allows the substantially more efficient distribution of information about local emergencies than mobile wireless providers' distribution systems, and every effort should be made to encourage the use of the more efficient local radio system so that the mobile wireless networks can more effectively be used for one-to-one and other communications for which the mobile wireless network system is better suited.
- Of course, with virtually all smartphones already containing an integrated FM radio as part of the smartphone's WIFI/Bluetooth chip set,⁶ the cost of providing this life-saving information from local radio stations to smartphone owners is effectively non-existent. Yet, as the Joint Commenters effectively demonstrated, the public safety benefits are enormous. The cost-benefit analysis of encouraging the activation of the FM radio in smartphones is not even a close call.

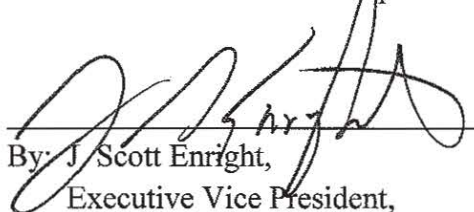
⁵ "Why Cell Phone Networks Fail in Emergencies," Bloomberg Business, April 16, 2013.

⁶ "FM Radio in Smartphones," NAB Labs 2015, <http://www.nablab.org/projects/project.asp?id=3550>.

For the reasons set forth above, as well as the reasons articulated in the Joint Comments, Emmis respectfully requests that, through this proceeding, the Commission strongly encourage all efforts to cause the FM radio chips in smartphones to be activated and available for use by all smartphone owners.

Respectfully submitted,

Emmis Communications Corporation

A handwritten signature in black ink, appearing to read "J. Scott Enright", is written over a horizontal line.

By: J. Scott Enright,
Executive Vice President,
General Counsel
and Secretary